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*Attorneys for Debtors and Reorganized Debtors*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**In re:**

**PG&E CORPORATION,**

**- and -**

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

**Debtors.**

- ☐ Affects PG&E Corporation  
☐ Affects Pacific Gas and Electric Company  
☒ Affects both Debtors

*\* All papers shall be filed in the Lead Case, No. 19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**DECLARATION OF ROBB MCWILLIAMS  
IN SUPPORT OF REORGANIZED  
DEBTORS' TWENTY-SIXTH SECURITIES  
CLAIMS OMNIBUS OBJECTION  
(SECURITIES ADR NO LIABILITY  
CLAIMS)**

**Response Deadline:  
October 3, 2023, 4:00 p.m. (PT)**

**Hearing Information If Timely Response Made:**

Date: October 17, 2023

Time: 10:00 a.m. (Pacific Time)

Place: (Tele/Videoconference Appearances Only)

United States Bankruptcy Court

Courtroom 17, 16th Floor

San Francisco, CA 94102

1 I, Robb McWilliams, pursuant to section 1746 of title 28 of the United States Code, hereby  
2 declare under penalty of perjury that the following is true and correct to the best of my knowledge,  
3 information, and belief:

4 1. I am a Partner and Managing Director at the firm of AlixPartners, LLP (“**AlixPartners**”),  
5 which is an affiliate of both AlixPartners, LLC and AP Services, LLC, (“**APS**”). APS was previously  
6 retained to provide interim management services to PG&E Corporation and Pacific Gas and Electric  
7 Company, as debtors and reorganized debtors (collectively, the “**Debtors**,” and as reorganized pursuant  
8 to the Plan, the “**Reorganized Debtors**”) in the above-captioned chapter 11 cases (the “**Chapter 11**  
9 **Cases**”). I submit this Declaration in support of the *Reorganized Debtors’ Twenty-Sixth Securities*  
10 *Claims Omnibus Objection* (the “**Omnibus Objection**”), filed contemporaneously herewith.<sup>1</sup>

11 2. In my current position, I am responsible for overseeing the bankruptcy case management  
12 component of AlixPartners’ assignment to assist the Reorganized Debtors with various matters related  
13 to these Chapter 11 Cases. My areas of responsibility includes the effort by AlixPartners, in coordination  
14 with the Reorganized Debtors, to review and assess the validity of all claims asserted against the Debtors,  
15 other than (a) Fire Claims and Subrogation Wildfire Claims, and (b) providing support with respect to  
16 Securities Claims. I am generally familiar with the Reorganized Debtors’ day-to-day operations,  
17 financing arrangements, business affairs, and books and records. Except as otherwise indicated herein,  
18 all facts set forth in this Declaration are based upon my personal knowledge, the knowledge of other  
19 AlixPartners professionals working under and alongside me on this matter, my discussions with the  
20 Reorganized Debtors’ personnel and the Reorganized Debtors’ various advisors and counsel, and my  
21 review of relevant documents and information. If called upon to testify, I would testify competently to  
22 the facts set forth in this Declaration. I am authorized to submit this Declaration on behalf of the  
23 Reorganized Debtors.

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25 \_\_\_\_\_  
26 <sup>1</sup> Capitalized terms used but not otherwise defined herein have the meanings ascribed to such terms in the  
27 Omnibus Objection.  
28

1           3.       The AlixPartners team under my supervision has been actively and intimately involved  
2 in the claims review and reconciliation process. AlixPartners initially assisted the Debtors in the  
3 preparation of their bankruptcy schedules based on the Debtors' books and records. AlixPartners is now  
4 supporting, and will continue to support, the efforts of the Reorganized Debtors and their counsel to  
5 resolve disputed claims, including by formal objections as necessary.

6           4.       As part of the claims review and reconciliation process, the AlixPartners team, working  
7 with the Reorganized Debtors' personnel and other professionals, has identified a number of filed Proofs  
8 of Claim for which Claimants have not complied with the Securities ADR Procedures Order by failing  
9 to respond to offers made pursuant to the Offer Procedures of the Securities ADR Procedures — even  
10 after a significant number of reminders and outreach by the Reorganized Debtors and their advisors.

11          5.       The Omnibus Objection is directed to Proofs of Claim identified in **Exhibit 1** to the  
12 Omnibus Objection, in the column headed "Claims to Be Disallowed and Expunged," and referred to in  
13 the Omnibus Objection as "Securities ADR No Liability Claims." **Exhibit 1** to the Omnibus Objection  
14 was prepared by the AlixPartners team under my overall supervision, and I am familiar with the  
15 document, its contents, and the process under which it was prepared.

16          6.       The Reorganized Debtors sent each of the Claimants listed in **Exhibit 1** a Settlement  
17 Offer pursuant to the Offer Procedures, and specifically the Securities Procedures at Section II.A. The  
18 Settlement Offer provided each Claimant with detailed instructions on how to respond to the Settlement  
19 Offer, including through the Securities Claims Settlement Portal, by email, or by mail. The Settlement  
20 Offer notified each Claimant that the Securities ADR Procedures Order requires the Claimant to accept,  
21 reject, or make a counteroffer by the Settlement Response Deadline. After the Settlement Offers were  
22 issued, if a Claimant listed in **Exhibit 1** set forth a valid telephone number in their proof of claim,  
23 AlixPartners attempted a reminder call to each such Claimant by phone to notify them of the Settlement  
24 Offer. Of the Claimants listed in **Exhibit 1**, AlixPartners was unable to complete a phone call to fourteen  
25 Claimants due to the phone number provided not being in service. AlixPartners was also unable to leave  
26 a voicemail for a further twenty-three Claimants.

7. Where a Claimant failed to respond to the Settlement Offer by the Settlement Response Deadline, the Reorganized Debtors sent such Claimant an offer reminder (the “**Offer Notice Reminder**”) by email. AlixPartners provided at least one reminder email regarding the pendency of the Settlement Offers to all Claimants listed in **Exhibit 1**. In addition, on or about June 30, 2023, a hardcopy mailing was sent to each Claimant listed in **Exhibit 1** to inform them of their outstanding settlement offer. These reminder communications provided each Claimant with detailed instructions on how to respond to the Settlement Offer, including through the Securities Claims Settlement Portal, by email, or by mail. These reminder communications also notified each Claimant that the Securities ADR Procedures Order requires the claimant to accept, reject, or make a counteroffer no later than thirty-five (35) days of the mailing of the Offer Notice (the “**Settlement Response Deadline**”).

8. In accordance with the Securities ADR Procedures Order, the response to the Settlement Offer must be received by the Reorganized Debtors by the Settlement Response Deadline. The Reorganized Debtors did not receive an acceptance, rejection, or counteroffer by the Settlement Response Deadline, nor have they received any acceptance, rejection, or counteroffer up until the date of the filing of this Objection, with respect to any of the Claims identified on **Exhibit 1**.

*[Remainder of Page Intentionally Left Blank]*

1 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and  
2 correct to the best of my knowledge, information, and belief.

3  
4 Executed August 31, 2023 in Dallas, Texas.

5  
6 /s/ Robb McWilliams  
7 Robb McWilliams  
8 Partner and Managing Director  
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